

Mr. Christy Miller  
Supreme Corporation  
P.O. BOX 463  
Elkhart, IN 46515-0349

Re: Significant Source Modification No:  
039-10937-00103

Dear Mr. Christy Miller:

Supreme Corporation applied for a Part 70 operating permit (T039-6046-00103) on June 3, 1996 for a truck and bus manufacturing operation. An application to modify the source was received on May 6, 1999. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) One (1) bake booth, located in the plant 8 paint shop, identified as H4, with a rated heat input of 1.2 mmBtu per hour and exhausting to stack SV H4. This new bake booth will be added to the existing painting operations, identified as H-1, H-2 and H-3, located in the plant 8 paint shop, and
- (b) The three existing spray bake booths identified as H-1, H-2 and H-3, each equipped with dry filters for air pollution control, each equipped with a 32,000 acfm exhaust fan, will increase their maximum capacities from 0.375 units per hour to 14 units per day.

The proposed Significant Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). If there are no changes to the proposed construction of the emission units, the source may begin operating on the date that IDEM receives an affidavit of construction pursuant to 326 IAC 2-7-10.5(h). If there are any changes to the proposed construction the source can not operate until an Operation Permit Validation Letter is issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter please contact Phillip Ritz, at 973-575-2555 (ext. 3241) or 1-800-451-6027 press 0 and ask for extension 3-6878.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments  
PR/EVP

cc: File - Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Air Compliance Section Inspector Greg Wingstrom  
Compliance Data Section - Jerri Curless  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Nancy Landau

# **PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT**

**Supreme Corporation  
16500 County Road 38  
Elkhart, IN 46515**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 039-10937-00103	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary truck and bus manufacturing operation.

Responsible Official: Christy Miller  
Source Address: 16500 County Road 38, Elkhart, IN 46515  
Mailing Address: P.O. Box 463, Elkhart, IN 46515  
Phone Number: 219-642-4888  
SIC Code: 3713  
County Location: Elkhart  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) bake booth, located in the plant 8 paint shop, identified as H4, with a rated heat input of 1.2 mmBtu per hour and exhausting to stack SV H4. This new bake booth will be added to the existing painting operations, identified as H-1, H-2 and H-3, located in the plant 8 paint shop,
- (b) The spray bake booth identified as H-1, equipped with dry filters for air pollution control, equipped with a 32,000 acfm exhaust fan, with a maximum capacity of 14 units per day, and
- (c) The spray bake booths identified as H-2 and H-3, each equipped with dry filters for air pollution control, each equipped with a 32,000 acfm exhaust fan, with a maximum capacity of 0.375 units per hour.
- (d) two (2) Safety Kleen cold cleaner degreasers utilizing remote solvent reservoirs, exhausting inside, using a maximum of 12.0 gallons of solvent per day.

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B                      GENERAL CONSTRUCTION CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2      Definitions [326 IAC 2-7-1]**

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### **B.3      Effective Date of the Permit [IC13-15-5-3]**

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

### **B.4      Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]**

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.5      Significant Source Modification [326 IAC 2-7-10.5(h)] [326 IAC 2-7-2(d)]**

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

However, in the event that the Title V application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:

- (a) If the Title V draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification (SSM) will be included in the Title V draft.
- (b) If the Title V permit has gone thru final EPA proposal and would be issued ahead of the SSM, then the SSM will go thru a concurrent 45 day EPA review. Then the SSM will be incorporated into the final Title V permit at the time of issuance.
- 3) If the Title V permit has not gone thru final EPA review and would be issued after the

SSM is issued, then the SSM would be added to the proposed Title V permit, and the Title V permit will be issued after EPA review.

## SECTION C GENERAL OPERATION CONDITIONS

### C.1 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

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- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this approval, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

### C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

### C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.
- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management



Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

#### C.4 Opacity [326 IAC 5-1]

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

#### C.5 Operation of Equipment [326 IAC 2-7-6(6)]

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All air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

### Testing Requirements [326 IAC 2-7-6(1)]

#### C.7 Performance Testing [326 IAC 3-6]

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **C.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Compliance with applicable requirements shall be documented as required by this approval. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this approval. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **C.9 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

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- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this approval until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

#### **C.10 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]**

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- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this approval;
  - (3) The Compliance Monitoring Requirements in Section D of this approval;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of :
  - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and
  - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.11 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency.

IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **C.12 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

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- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

#### **C.13 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;

- (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this approval;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from a approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

**C.14 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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- (a) The reports required by conditions in Section D of this approval shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) Unless otherwise specified in this approval, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) bake booth, located in the plant 8 paint shop, identified as H4, with a rated heat input of 1.2 mmBtu per hour and exhausting to stack SV H4. This new bake booth will be added to the existing painting operations, identified as H-1, H-2 and H-3, located in the plant 8 paint shop,
- (b) The spray bake booth identified as H-1, equipped with dry filters for air pollution control, equipped with a 32,000 acfm exhaust fan, with a maximum capacity of 14 units per day, and
- (c) The spray bake booths identified as H-2 and H-3, each equipped with dry filters for air pollution control, each equipped with a 32,000 acfm exhaust fan, with a maximum capacity of 0.375 units per hour.
- (d) two (2) Safety Kleen cold cleaner degreasers utilizing remote solvent reservoirs, exhausting inside, using a maximum of 12.0 gallons of solvent per day.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

This facility shall use less than 40 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 40 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP039-7321-00103, issued on May 28, 1997, BACT for the three (3) spray/bake booths (H-1, H-2 and H-3) has been determined to be a combination of the use of high volume low pressure (HVLP) spray equipment and limits on the VOC content of coating used on fiberglass substrates. VOC content of the coatings shall be limited to 6.5 pounds of VOC per gallon of coating less water for basecoats and 5.1 pounds of VOC per gallon of VOC per gallon of coating for clearcoats. These VOC content limitations shall not apply when the application is engaged in work for governmental entities which require the use of special coatings.

#### D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray/bake booth H-1 when coating metal surfaces, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

#### D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the one (1) bake booth, located in the plant 8 paint shop, identified as H4, and the three (3) spray/bake booths (H-1, H-2 and H-3), shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and

P = process weight rate in tons per hour

#### D.1.5 Volatile Organic Compounds (VOC)

---

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the spray/bake booths, identified as H-1, H-2 and H-3 and any control devices.

### Compliance Determination Requirements

#### D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limit specified in Condition D.1.1, D.1.2, D.1.3 and D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.1.8 Volatile Organic Compounds (VOC)

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Compliance with the VOC content and usage limitations contained in Conditions D.1.1, D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.1.9 VOC Emissions

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Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

#### D.1.10 Particulate Matter (PM)

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The dry filters for PM control shall be in operation at all times when the three (3) spray/bake booths (H-1, H-2 and H-3) are in operation.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]



#### D.1.11 Monitoring

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the three (3) spray/bake booth stacks (SV H-1, H-2 and H-3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### D.1.12 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1, D.1.2 and D.1.3.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used for each day;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each month; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION  
CERTIFICATION**

Source Name: Supreme Corporation  
Source Address: 16500 County Road 38, Elkhart, IN 46515  
Mailing Address: P.O. Box 463, Elkhart, IN 46515  
Source Modification No.: 039-10937-00103

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.**

Please check what document is being certified:

- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Source Modification Quarterly Report**

Source Name: Supreme Corporation  
Source Address: 16500 County Road 38, Elkhart, IN 46515  
Mailing Address: P.O. Box 463, Elkhart, IN 46515  
Source Modification No.: 039-10937-00103  
Facility: three (3) spray/bake booths (H-1, H-2 and H-3)  
Parameter: VOC  
Limit: This facility shall use less than 40 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	VOC Usage 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Mail to: Permit Administration & Development Section  
Office Of Air Management  
100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-6015

Supreme Corporation  
P.O. BOX 463  
Elkhart, IN 46515

**Affidavit of Construction**

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make  
these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Supreme Corporation, 16500 County Road 38, Elkhart, IN 46515, has constructed the bake booth and the increase in the maximum capacities of three spray booths in the plant 8 paint shop in conformity with the requirements and intent of the Significant Source Modification application received by the Office of Air Management on May 6, 1999 and as permitted pursuant to **Significant Source Modification No.: 039-10937-00103** issued on \_\_\_\_\_.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of  
Indiana on this \_\_\_\_\_ day of \_\_\_\_\_, 19 \_\_\_\_\_.

My Commission expires: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name (typed or printed)

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for a Significant Source Modification to a Part 70 Operating Permit

Source Name:	Supreme Corporation
Source Location:	16500 County Road 38, Elkhart, IN 46515
County:	Elkhart
Operation Permit No.:	T039-6046-00103
Significant Source Modification No.:	039-10937-00103
SIC Code:	3713
Permit Reviewer:	Phillip Ritz/EVP

On July 7, 1999, the Office of Air Management (OAM) had a notice published in the Goshen News, Goshen, Indiana, stating that Supreme Corporation had applied for a construction permit to construct and operate the addition of a bake booth and the increase in the maximum capacities of three spray booths in the plant 8 paint shop with control. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On August 9, 1999, Teri Schenk of SESCO Group submitted comments on behalf of Supreme Corporation on the proposed Significant Source Modification to a Part 70 Operating Permit. The summary of the comments and corresponding responses is as follows:

#### Comment 1

In Condition D.1.3, all three booths could on occasion run fiberglass/plastic parts through them. The miscellaneous metal coating rules should apply to any booth area that is a metal application process and the BACT limits for FRP coating should apply whenever fiberglass or plastic units are being coated.

#### Response 1

Condition D.1.3 has been revised to clarify that the miscellaneous metal coating rules (326 IAC 8-2-9) apply only when the source is coating metal surfaces. The changes to the permit are as follows:

#### D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

---

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray/bake booth H-1 **when coating metal surfaces**, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

#### Comment 2

Please include the safety-kleen gun cleaning machines for cleanup purposes. There are two, one that was installed from the new processes of H1 and H3, and one that was transferred from the H1 permit.

## Response 2

The safety-kleen cold cleaner degreasers, which were included in the emission calculations for the modification, have been added to the TSD New Emission Units and Pollution Control Equipment on page 6 of 7.

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

The changes to the TSD are as follows:

- (c) two (2) Safety Kleen cold cleaner degreasers utilizing remote solvent reservoirs, exhausting inside, using a maximum of 12.0 gallons of solvent per day.

On page 6 of 7 of the TSD under State Rule Applicability - Individual Facilities, a discussion of 326 IAC 8-3-2 has also been added as follows:

### **326 IAC 8-3-2 (Cold Cleaner Operations)**

**The cold cleaner degreaser at this source,, is subject to 326 IAC 8-3-2. Pursuant to this rule, the owner or operator shall:**

- (a) Equip the cleaner with a cover;**
- (b) Equip the cleaner with a facility for draining cleaned parts;**
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;**
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;**
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;**
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.**

On page 4 of 18, Section A.2, and page 14 of 18, Section D1.1, the following unit description has been added as follows:

- (d) two (2) Safety Kleen cold cleaner degreasers utilizing remote solvent reservoirs, exhausting inside, using a maximum of 12.0 gallons of solvent per day.**

On page 14 of 18 (now page 14 of 19), Condition D1.5 has been added as follows, and the remaining conditions have been re-numbered:

### **D.1.5 Volatile Organic Compounds (VOC)**

**Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:**

- (a) Equip the cleaner with a cover;**
- (b) Equip the cleaner with a facility for draining cleaned parts;**

- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;**
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;**
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;**
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.**

**Comment 3**

The rest of the permit looks standard. I only have a question about putting the 14 units on the H1 line. Since H1 was a transfer from another older permit, no limits were ever set. I believe stating that the Plant 8 Paint shop booths have a 40 ton limit covers what needs to be addressed.

**Response 3**

Booth H1 has been modified in this Significant Source Modification 039-10937-00103 to increase its maximum capacity, and has been previously permitted with a maximum capacity, specifically, Construction permit CP 039-7321-00103, which lists "three (3) spray/bake booths known as H-1, H2, and H-3, each equipped with dry filters for air pollution control, each equipped with a 32,000 acfm exhaust fan, total capacity: 0.375 vehicles per hour." as the previous capacity of H-1, H2, and H-3.

The maximum capacities listed in the emission unit descriptions are not required to be in the Title V Operating Permit, however, this information is needed by IDEM, OAM in order to completely assess the source's potential to emit. The process specific emissions limitations identified in Section D of the permit are often determined from this information. Physical changes or changes in the method of operation that changed the capacity may also increase the emission unit's potential to emit. Documenting the capacity will assist both the permittee and the IDEM in evaluating whether such a change requires a preconstruction permit or other approval. If these capacities are not accurate, the source is required to notify IDEM, OAM since this may change the applicability of the air permitting rules, and may result in an administrative amendment to the permit. Since these maximum capacities are subject to change it might be best for this permit to read "average capacity" or "nominal capacity" in order to clarify the flexibility of the manufacturing capabilities, however, no changes will be made to the permit at this time.



## **Indiana Department of Environmental Management Office of Air Management**

### **Technical Support Document (TSD) for a Significant Source Modification to a Part 70 Operating Permit**

#### **Source Background and Description**

Source Name:	Supreme Corporation
Source Location:	16500 County Road 38, Elkhart, IN 46515
County:	Elkhart
SIC Code:	3713
Operation Permit No.:	T039-6046-00103
Significant Source Modification No.:	039-10937-00103
Permit Reviewer:	Phillip Ritz/EVP

The Office of Air Management (OAM) has reviewed a modification application from Supreme Corporation relating to the construction and operation of the addition of a bake booth and the increase in the maximum capacities of three spray booths in the plant 8 paint shop.

#### **History**

On May 6, 1999, Supreme Corporation submitted an application to the OAM requesting to add a bake booth to their existing stationary truck and bus manufacturing operation. Supreme Corporation applied for a Part 70 permit (T039-6046-00103) on June 3, 1996.

#### **New Emission Units and Pollution Control Equipment**

The application includes information relating to the construction and operation of the following equipment:

- (a) One (1) bake booth, located in the plant 8 paint shop, identified as H4, with a rated heat input of 1.2 mmBtu per hour and exhausting to stack SV H4. This new bake booth will be added to the existing painting operations, identified as H-1, H-2 and H-3, located in the plant 8 paint shop, and
- (b) The existing spray bake booth identified as H-1, equipped with dry filters for air pollution control, equipped with a 32,000 acfm exhaust fan, will increase maximum capacity from 0.375 units per hour to 14 units per day. Booths H-2 and H-3 will not be modified.

#### **Existing Approvals**

The source applied for a Part 70 permit (T039-6046-00103) on June 3, 1996. The source has been operating under previous approvals including, but not limited to, the following:

- (a) Construction Permit No.: 039-00103, issued on July 25, 1991;
- (b) Registration No.: 039-3531, issued on March 16, 1994;
- (c) Construction Permit No.: 039-3362, issued on February 21, 1995;
- (d) Construction Permit No.: 039-7321, issued on July 31, 1997; and
- (e) Construction Permit No.: 039-9080, issued on February 17, 1998

#### **Enforcement Issue**

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
SV H-4	bake booth	30	3.5	4,000	72

### Recommendation

The staff recommends to the Commissioner that the Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 6, 1999.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 4.)

### Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	18.78
PM-10	18.78
SO <sub>2</sub>	0.00
VOC	45.85
CO	0.00
NO <sub>x</sub>	0.00

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene	greater than 10
Toluene	greater than 10
Methyl Ethyl Ketone	less than 10
MIKB	less than 10
Hexane	less than 10
Glycol Ethers	less than 10
Methanol	less than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5-1.3.
- (b) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1997 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.00
PM-10	0.00
SO <sub>2</sub>	0.01
VOC	116.60
CO	0.27
NO <sub>x</sub>	0.00
HAP (specify)	0.00

### Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Any Single HAP	Total HAPs
Spray Booth H1, H2, H3	2.40	2.40	0.00	39.00	0.00	0.00	(Xylene) 8.59	20.70
Bake Booth H4	0.00	0.00	0.00	0.00	0.40	0.50	0.00	0.00
Total Emissions	2.40	2.40	0.00	39.00	0.40	0.50	(Xylene) 8.59	20.70

Note: Pursuant to Construction Permit CP (039-7321-00103), a Construction Permit which was public noticed on May 28, 1997. VOC emissions from the three (3) spray/bake booths (H-1, H-2 and H-3) shall be limited to 39 tons per year, based on a 12 consecutive month period, rolled on a monthly basis. The source is adding the proposed bake booth to the existing plant 8 paint shop for the purpose of increased worker safety and flexibility and will maintain its current limited potential to emit of VOC of less than 40 tons per year under the Construction Permit which was issued on May 28, 1997. Since this modification to the existing line will not increase limited potential to emit VOC, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the

formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone.

### Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Potential to Emit (tons/year)
PM	less than 25
PM-10	less than 15
SO <sub>2</sub>	less than 40
VOC	greater than 250
CO	less than 100
NO <sub>x</sub>	less than 40

- (a) This existing source is a major stationary source because at least one attainment regulated pollutant is emitted at a rate of 250 tons per year.
- (b) These emissions were based on the Construction Permit CP (039-7321-00103), issued on May 28, 1997.

### Part 70 Permit Determination

#### 326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 permit application (T039-6046-00103) on June 3, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

### State Rule Applicability - Entire Source

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC in Elkhart county. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen

(15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### State Rule Applicability - Individual Facilities

#### 326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to Construction Permit CP (039-7321-00103), a Construction Permit which was public noticed on May 28, 1997, the VOC emissions from the three (3) spray/bake booths (H-1, H-2 and H-3) shall be limited to 39 tons per year, based on a twelve (12) consecutive month period, rolled on a monthly basis. The source is adding the proposed bake booth to the existing plant 8 paint shop for the purpose of increased worker safety and flexibility and will maintain its current limited potential to emit of VOC of 39 tons per year under the Construction Permit which was issued on May 28, 1997. Since this modification to the existing line will not increase limited potential to emit VOC, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

#### 326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the three (3) spray/bake booths (H-1, H-2 and H-3) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the spray booths are in operation, in order to comply with this limit.

#### 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Pursuant to CP039-7321-00103, issued on May 28, 1997, BACT for the three (3) spray/bake booths (H-1, H-2 and H-3) has been determined to be a combination of the use of high volume low pressure (HVLP) spray equipment and limits on the VOC content of coating used on fiberglass substrates. VOC content of the coatings shall be limited to 6.5 pounds of VOC per gallon of coating less water for basecoats and 5.1 pounds of VOC per gallon of VOC per gallon of coating for clearcoats. These VOC content limitations shall not apply when the application is engaged in work for governmental entities which require the use of special coatings. Pursuant to Construction Permit CP (039-7321-00103), a Construction Permit which was public noticed on May 28, 1997, the VOC emissions from the three (3) spray/bake booths (H-1, H-2 and H-3) shall be limited to 39 tons per year, based on a twelve (12) consecutive month period, rolled on a monthly basis. This is the same 39 ton per year limit that the original BACT was based on, and therefore BACT does not have to be re-evaluated.

#### 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating)

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating) does not apply to this source because the gross weight of the trucks coated exceeds 8,500 pounds.

#### 326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the three (3) spray/bake booths (H-1, H-2 and H-3) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

#### 326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source is subject to another provision of Article 8 (326 IAC 8-2-9), therefore, 326 IAC 8-6 (Organic Solvent Emission Limitations) does not apply.

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The three (3) spray/bake booths (SV H-1, H-2 and H-3) have applicable compliance monitoring conditions as specified below:
  - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the three (3) spray/bake booth stacks (SV H-1, H-2 and H-3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit. Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit. Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filter for the three (3) spray/bake booths (SV H-1, H-2 and H-3) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

## **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations. (Appendix A, page 2 of 4)

## **Conclusion**

The construction and operation of the addition of a bake booth and the increase in the maximum capacities of three spray booths in the plant 8 paint shop shall be subject to the conditions of the attached proposed Significant Source Modification No.: 039-10937-00103.

## Appendix A: Emission Calculations

**Company Name:** Supreme Corporation  
**Address City IN Zip:** 16500 County Road 38  
**SSM:** 039-10937-00103  
**Reviewer:** Phillip Ritz/EVP  
**Date:** May 5, 1999

Uncontrolled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Spray Booth H1, H2, H3	Bake Booth H4	TOTAL
PM	18.78	0.00	18.78
PM10	18.78	0.00	18.78
SO2	0.00	0.00	0.00
NOx	0.00	0.50	0.50
VOC	45.85	0.00	45.85
CO	0.00	0.40	0.40
total HAPs	20.70	0.00	20.70
worst case single HAP	(Xylene) 8.59	0.00	(Xylene) 8.59
Total emissions based on rated capacity at 8,760 hours/year.			
Controlled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Spray Booth H1, H2, H3	Bake Booth H4	TOTAL
PM	2.40	0.00	2.40
PM10	2.40	0.00	2.40
SO2	0.00	0.00	0.00
NOx	0.00	0.50	0.50
VOC	39.00	0.00	39.00
CO	0.00	0.40	0.40
total HAPs	20.70	0.00	20.70
worst case single HAP	(Xylene) 8.59	0.00	(Xylene) 8.59
Total emissions based on rated capacity at 8,760 hours/year, after control.			



**Appendix A: Emission Calculations**  
**HAP Emission Calculations**

Page 3 of 4 TSD AppA

**Company Name: Supreme Corporation**  
**Address City IN Zip: 16500 County Road 38**  
**SSM: 039-10937-00103**  
**Reviewer: Phillip Ritz/EVP**  
**Date: May 5, 1999**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Ethel Ketone	Weight % MIKB	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methyl Ethel Ketone Emissions (ton/yr)	MIKB Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)
Accessory Solvent Cleaner	7.00	0.100	5.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Imron 5000 Low VOC	8.80	2.500	0.56	15.00%	15.75%	0.00%	0.00%	0.00%	0.00%	0.00%	8.02	8.42	0.00	0.00	0.00	0.00	0.00
DuPont Corier System	10.10	1.250	0.56	28.00%	10.00%	12.00%	0.00%	0.00%	0.00%	0.00%	8.59	3.07	3.68	0.00	0.00	0.00	0.00

Total State Potential Emissions	<b>8.59</b>	<b>8.42</b>	<b>3.68</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
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**METHODOLOGY**

20.70

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations****Natural Gas Combustion Only****MM BTU/HR <100****Small Industrial Boiler****Company Name: Supreme Corporation****Address City IN Zip: 16500 County Road 38****SSM: 039-10937-00103****Reviewer: Phillip Ritz/EVP****Date: May 5, 1999**Heat Input Capacity  
MMBtu/hrPotential Throughput  
MMCF/yr

1.2

10.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.0	0.0	0.0	**see below	0.0	0.4

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

